

**IN THE UNITED STATES DISTRICT COURT FOR THE
MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION**

JOHNNY M. HUNT,)	
)	
Plaintiff,)	
)	
vs.)	Case No. 3:23-cv-00243
)	
SOUTHERN BAPTIST CONVENTION;)	Judge Richardson
GUIDEPOST SOLUTIONS LLC; and)	Magistrate Judge Frensley
EXECUTIVE COMMITTEE OF THE)	Jury Demand
SOUTHERN BAPTIST CONVENTION,)	
)	
Defendants.)	

MOTION TO COMPEL

Pursuant to Rule 37 of the Federal Rules of Civil Procedure, Plaintiff Johnny M. Hunt, by and through the undersigned counsel, respectfully moves this Court to compel Defendant Guidepost Solutions LLC (“Guidepost”) to produce all non-privileged documents responsive to Plaintiff’s First Request for Production of Documents to Defendant Guidepost Solutions LLC (“First RFP”) and Plaintiff’s Second Request for Production to Defendant Guidepost Solutions LLC (“Second RFP”) (collectively the “Document Requests”) by a date certain.

As explained in the accompanying Memorandum, Guidepost is deficient in its responses to Plaintiff’s document requests, refuses to provide a date certain by which it will produce the remaining non-privileged responsive documents, and has not asserted valid objections excusing its failure to produce the documents in its possession responsive to Plaintiff’s request for production to date. Guidepost has repeatedly backtracked on its own promises to produce responsive documents by specific times, and Guidepost’s refusal to comply with its obligations

under the Federal Rules of Civil Procedure is stalling the progression of this litigation and preventing the taking of oral discovery.

As required by Local Rule 7.01, counsel for Plaintiff hereby certifies that they have conferred in good faith with counsel for Guidepost regarding the nature of this Motion, the issues raised in this Motion, and the relief requested in this Motion. Despite having met and conferred with counsel for Guidepost multiple times regarding this discovery dispute, Plaintiff and Guidepost have been unable to resolve this discovery dispute without seeking the Court's assistance. Plaintiff and Guidepost filed a Joint Discovery Dispute Statement regarding the issues raised in this Motion on September 15, 2023. (Doc. No. 56). Plaintiff has requested the scheduling of a telephonic discovery conference regarding the issues raised in this Motion, but no conference has yet been scheduled or occurred. Plaintiff respectfully submits this Motion in the interests of seeking the Court's assistance in resolving this discovery dispute and expediting this litigation.

For the foregoing reasons, as well as the reasons set forth in the accompanying Memorandum and the Joint Discovery Dispute Statement filed on September 15, 2023, (Doc. No. 56), this Court should grant this Motion and enter an Order compelling Guidepost to produce all non-privileged documents responsive to the Document Requests by a date certain. Pursuant to Rule 37(a)(5)(A) of the Federal Rules of Civil Procedure, this Court should also award Plaintiff his reasonable expenses, including attorney's fees, incurred in making this Motion.

Dated: October 6, 2023

Respectfully submitted,

s/ Andrew Goldstein

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CERTIFICATE OF SERVICE

I hereby certify that I caused a true and correct copy of the foregoing Motion to Compel on October 6, 2023, using the CM/ECF system, which will automatically serve all counsel of record listed below:

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